



GEORGIA

DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

Air Quality - Part 70 Operating Permit Amendment

Facility Name: Geiger International, Inc.
Facility Address: 6095 Fulton Industrial Blvd. SW
Atlanta, GA 30336, Fulton County
Mailing Address: 6095 Fulton Industrial Blvd. SW
Atlanta, GA 30336
Parent/Holding Company: Herman Miller International
Facility AIRS Number: 04-13- 121-00558

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Georgia Rules for Air Quality Control, Chapter 391-3-1, adopted pursuant to and in effect under the Act, the Permittee described above is issued an amendment to the Part 70 Operating Permit for:

The reduction of facility-wide VOC emissions limit from 100 tons/year to 25 tons/year.

This Permit Amendment is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Amendment and Permit No. **2521-121-0558-V-04-0**. Unless modified or revoked, this Amendment expires simultaneously with Permit No. **2521-121-0558-V-04-0**. This Amendment may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in App No. **TV-43781** dated **November 30, 2016**; any other applications upon which this Amendment or Permit No. **2521-121-0558-V-04-0** are based; supporting data entered therein or attached thereto; or any subsequent submittal or supporting data; or for any alterations affecting the emissions from this source.

This Amendment is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached **10** pages.



DRAFT

Richard E. Dunn, Director
Environmental Protection Division

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PART 1.0 FACILITY DESCRIPTION

1.3 Process Description of Modification

Geiger International, Inc. is proposing to reduce the facility-wide VOC emissions limit from 100 tons/year to 25 tons/year. Several changes to the permit conditions are made. Conditions pertaining to Georgia Rule (hhh) are no longer applicable and are removed in this modification. NSR avoidance Conditions are added. Facility will continue to be subject to 40 CFR Part 63 Subpart JJ.

PART 2.0 REQUIREMENTS PERTAINING TO THE ENTIRE FACILITY

2.1 Facility Wide Emission Caps and Operating Limits

Modified Condition:

- 2.1.1 The Permittee shall not discharge or cause the discharge into the atmosphere from the facility volatile organic compounds in amounts equal to or exceeding 25 tons during any twelve consecutive month period.
[Avoidance of 40 CFR Part 70]

2.2 Facility Wide Federal Rule Standards

None applicable.

2.3 Facility Wide SIP Rule Standards

None applicable.

2.4 Facility Wide Standards Not Covered by a Federal or SIP Rule and Not Instituted as an Emission Cap or Operating Limit

None applicable.

PART 3.0 REQUIREMENTS FOR EMISSION UNITS

Note: Except where an applicable requirement specifically states otherwise, the averaging times of any of the Emissions Limitations or Standards included in this permit are tied to or based on the run time(s) specified for the applicable reference test method(s) or procedures required for demonstrating compliance.

3.1.1 Updated Emission Units

Emission Units/Groups		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
WW01	Woodworking	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.4.1, 3.4.2, 5.2.2, 5.2.3, 5.2.4, 6.1.7, 6.2.15	APC8, APC9, APC10	Dust Collection System
MISC	Misc Group including Adhesive etc.	40 CFR 63 Subpart JJ 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.3.1 through 3.3.13, 3.4.1, 3.4.2, 5.2.1, 6.1.7, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, 6.2.6, 6.2.7, 6.2.8, 6.2.9, 6.2.10, 6.2.11, 6.2.15		N/A
SCG	Stain Coating Group	40 CFR 63 Subpart JJ 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.3.1 through 3.3.13, 3.4.1, 3.4.2, 5.2.1, 6.1.7, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, 6.2.6, 6.2.9, 6.2.10, 6.2.11, 6.2.15		N/A
DB	Dry Coating Booth Group	40 CFR 63 Subpart JJ 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.3.1 through 3.3.13, 3.4.1, 3.4.2, 3.5.1, 3.5.2, 5.2.1, 6.1.7, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.6, 6.2.6, 6.2.9, 6.2.10, 6.2.11, 6.2.14, 6.2.15		Fiberglass Filters
WB	Wet Coating Booth Group	40 CFR 63 Subpart JJ 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.3.1 through 3.3.13, 3.4.1, 3.4.2, 3.5.1, 3.5.3, 5.2.1, 5.2.5, 6.1.7, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, 6.2.6, 6.2.9, 6.2.10, 6.2.11, 6.2.15		Water Wash System
UVG	UV Line Group	40 CFR 63 Subpart JJ 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.3.1 through 3.3.13, 3.4.1, 3.4.2, 5.2.1, 6.1.7, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, 6.2.6, 6.2.9, 6.2.10, 6.2.11, 6.2.15		N/A

* Generally applicable requirements contained in this permit may also apply to emission units listed above.

* See Attachment D for detailed listing of emission units in each equipment group.

3.2 Equipment Emission Caps and Operating LimitsDeleted Condition:

3.2.1 Deleted

3.3 Equipment Federal Rule Standards

No changes.

3.4 Equipment SIP Rule Standards

Deleted Conditions:

3.4.3 Deleted

3.4.4 Deleted

3.5 Equipment Standards Not Covered by a Federal or SIP Rule and Not Instituted as an Emission Cap or Operating Limit

Modified Condition:

3.5.3 The Permittee shall perform a daily inspection of the water depth of the water wash system for Emission Group WB. The depth of the water is to be maintained between 12.5 and 15 inches. This check must be performed uniformly at a specific location.
[391-3-1-.02(2)(a)10]

Added Condition:

3.5.4 The Permittee shall maintain a copy of Attachment D to this Permit depicting the current list of emission units inside each group.
[391-3-1-.02(2)(a)10]

PART 5.0 REQUIREMENTS FOR MONITORING (Related to Data Collection)

5.2 Specific Monitoring Requirements

Modified Condition:

- 5.2.4 The Permittee shall perform a daily check of the depth of the water in the water wash system for Emission Group WB. The Permittee shall maintain a log indicating the date and the time that the water depth check is performed. Any depth measured outside the range stated in Condition 3.5.3 should be indicated in the log with the date and time of the incident as well as the corrective measures taken. These logs shall be kept available for inspection or submittal for five (5) years form the date of record.
[391-3-1-.02(6)(b)(1)(i)]

PART 6.0 OTHER RECORD KEEPING AND REPORTING REQUIREMENTS**6.1 General Record Keeping and Reporting Requirements**Modified Condition:

6.1.7 For the purpose of reporting excess emissions, exceedances or excursions in the report required in Condition 6.1.4, the following excess emissions, exceedances, and excursions shall be reported:

[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

b. Exceedances: (means for the purpose of this Condition and Condition 6.1.4, any condition that is detected by monitoring or record keeping that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) do not meet the applicable emission limitation or standard consistent with the averaging period specified for averaging the results of the monitoring)

i. Any VOC emissions from the entire facility exceeding 25 tons during any twelve consecutive month period,

xi. Deleted

xiii. Deleted

6.1.8 Deleted

6.2 Specific Record Keeping and Reporting RequirementsModified Condition:

6.2.3 The Permittee shall use the monthly usage records required by Condition 6.2.2 to determine and record the total monthly VOC emissions from the entire facility. The Permittee shall notify the Division in writing if VOC emissions exceed 2.08 tons during any calendar month. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to maintain compliance with the emission limit in Condition No. 2.1.1.

[391-3-1-.02(6)(b)1(i), 40 CFR 70.6(a)(3)(i)]

Modified Condition:

- 6.2.4 The Permittee shall use the calculations required by Condition 6.2.3 to determine and record the twelve-month rolling total of VOC emissions from the entire facility for each month in the reporting period. A twelve-month rolling total is equal to the sum of values from the previous eleven consecutive months plus the current month value. The Permittee shall notify the Division in writing if VOC emissions exceed 25 tons during any twelve consecutive month period. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to attain compliance with the emission limit specified in Condition No. 2.1.1.
[391-3-1-.02(6)(b)1(i), 40 CFR 70.6(a)(3)(i)]

Modified Condition:

- 6.2.5 If complying with Condition 3.3.6b, the Permittee shall use the records required by Condition Nos. 6.2.1 and 6.2.2 to determine and record the monthly average VHAP content across all finishing materials (including stains, washcoats, sealers, topcoats, basecoats, and enamels) using the following equation:
[391-3-1-.02(6)(b)1(i), 40 CFR 63.804(a)(1), and 40 CFR 63.806(c)]

$$E = \frac{\sum_{i=1}^n (M_{ci} C_{ci} + S_i W_i)}{\sum_{i=1}^n M_{ci}}$$

where:

E = Average VHAP content, in units of pound VHAP/pound solids.

M_{ci} = Mass of solids in finishing material i used monthly, in units of pound solids/month.

C_{ci} = VHAP content of finishing material i, in units of pound VHAP/pound solids, as supplied.

S_i = VHAP content of solvent i added to finishing materials, expressed as a weight fraction.

W_i = Amount of solvent i added to finishing materials during the monthly averaging period, in units of pounds.

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The Permittee shall maintain copies of the averaging equation for each month following the compliance date, as well as the data on the quantity of each finishing material used to support the calculation. The Permittee shall notify the Division in writing if the monthly weighted average VHAP content (E) exceeds the emission limit specified in Condition No. 3.3.3, as applied, during any calendar month. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to attain compliance with the emission limit specified in Condition No. 3.3.3.

[391-3-1-.02(6)(b)1(i), 40 CFR 63.804(a)(1) and (g)(1)]

6.2.12 Deleted

6.2.13 Deleted

6.2.16 Deleted

6.2.17 Deleted

6.2.18 Deleted

PART 7.0 OTHER SPECIFIC REQUIREMENTS**7.1 Operational Flexibility Associated with this Amendment**Added Condition:

7.1.2 The Permittee may relocate existing emissions units inside the same facility, as long as the potential to emit of the equipment will not be affected. For each relocation, the Permittee shall record the date of relocation, emission unit ID number, and permitted facilities and equipment groups involved in the relocation. The record shall include the justification, and any supporting data, indicating that no increase in emissions occurred.

7.2 Off-Permit Changes Associated with this Amendment

None applicable.

7.3 Alternative Requirements Associated with this Amendment

[White Paper #2]

Not Applicable

7.4 Insignificant Activities Associated with this Amendment

(see Attachment B for the list of Insignificant Activities in existence at the facility at the time of permit issuance)

7.5 Temporary Sources Associated with this Amendment

[391-3-1-.03(10)(d)5 and 40 CFR 70.6(e)]

Not Applicable

7.6 Short-term Activities Associated with this Amendment

(see Form D5 "Short Term Activities" of the Permit application and White Paper #1)

Not Applicable

7.7 Compliance Schedule/Progress Reports Associated with this Amendment

[391-3-1-.03(10)(d)3 and 40 CFR 70.6(c)(4)]

None applicable.

7.8 Emissions Trading Associated with this Amendment

[391-3-1-.03(10)(d)1(ii) and 40 CFR 70.6(a)(10)]

Not Applicable

7.9 Acid Rain Requirements Associated with this Amendment

Not Applicable

7.12 Revocation of Existing Permits and Amendments

The following Air Quality Permits and Amendments are subsumed by this permit and are hereby revoked:

Air Quality Permit Number(s)	Dates of Original Permit Issuance or Amendment
n/a	n/a

7.13 Pollution Prevention Associated with this Amendment

Not Applicable

7.14 Specific Conditions Associated with this Amendment

None applicable.

ATTACHMENT D**LIST OF EMISSION UNITS PER EQUIPMENT GROUP**

REGULATORY GROUPS	
EQUIPMENT GROUP	EMISSION UNIT I.D. NUMBERS
WB	PS04
DB	PS01, PS02, PS03, PS06
SCG	F001, FS01, FS02
UVG	UV01, UV02
MISC	AD01, EC01, MC01